

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

THUYHONG NGUYEN, an individual,

Plaintiff,

v.

CENTURYLINK, INC., a Louisiana
corporation,

Defendant.

NO. 2:17-cv-01341-RSL

JOINT STIPULATED MOTION
FOR RELIEF FROM DEADLINE
FOR INITIAL DISCLOSURES AND
JOINT STATUS REPORT AND
DISCOVERY PLAN

NOTE ON MOTION CALENDAR:
October 23, 2017.

The parties to this action, Plaintiff Thuy Nguyen and Defendant Centurylink, Inc. jointly and respectfully request that this Court modify its Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, Dkt. # 9. Good cause exists for relief from the deadline for initial disclosures and the combined joint status report and discovery plan. The parties request that the Court enter an order requiring initial disclosures to be exchanged pursuant to FRCP 26(a)(1) on November 16, 2017 and that the parties file the joint status report and discovery plan on November 16, 2017.

The parties request that the Court extend the two deadlines as the extension will ensure that the parties are able to incorporate Defendant's answer and affirmative defenses into the initial disclosures and joint status report and discovery plan. The Defendant in this case waived service of the summons and complaint and instead, accepted service pursuant to FRCP 4.

JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
DISCOVERY PLAN - 1

Case No. 2:17-cv-01341-RSL



801 Second Avenue, Suite 1415
Seattle, Washington 98104-1517
(206) 624-6271

1 *Waiver of Service, Dkt. # 11.* Accordingly, Defendant's answer is not due until sixty days have
2 elapsed after the waiver was sent, or here, November 7, 2017. FRCP 4(d)(3). Both the
3 Plaintiff's claims as well as affirmative defenses raised by the Defendant should be considered
4 in formulating a complete final joint status report and discovery plan. An extension would
5 enable the parties to formulate a complete joint status report and discovery plan.

6 For the reasons stated above, the parties stipulate and jointly move the Court to
7 extend the deadline for initial disclosures to be exchanged pursuant to FRCP 26(a)(1) on
8 November 16, 2017 and that the parties file the joint status report and discovery plan on
9 November 16, 2017.

10 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

11 REED LONGYEAR MALNATI & AHRENS, PLLC

12 s/Elizabeth A. Hanley

October 23, 2017

13 Elizabeth A. Hanley, WSBA # 38233
14 Reed Longyear Malnati & Ahrens, PLLC
15 801 Second Ave., Ste. 1415
16 Seattle, WA 98104
17 Tel. (206) 624-6271, Fax (206) 624-6672
18 Email: ehanley@reedlongyearlaw.com
19 Attorney for Plaintiff

Dated

20 KIOVSKY DUWALDT, LLC

21 s/Elizabeth I. Kiovsky

October 23, 2017

22 Elizabeth I. Kiovsky
23 Kiovsky Duwaldt, LLC
24 2820 Welton St.
Denver, CO 80205
Tel. (303) 320-8301
Fax (866) 804-9379
Email: beth@kdemploymentlaw.com
Attorneys for Defendant

Dated

JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
DISCOVERY PLAN - 2

Case No. 2:17-cv-01341-RSL


**REED
LONGYEAR**
801 Second Avenue, Suite 1415
Seattle, Washington 98104-1517
(206) 624-6271

LAW OFFICES OF THOMAS J. OWENS

s/Thomas J. Owens

Thomas J. Owens

Law Offices of Thomas J. Owens

1001 Fourth Avenue, Suite 4400

Seattle, WA 98154

Tel. (206) 250-0413

Fax (206) 389-1708

Attorney for Defendant

October 23, 2017

Dated

IT IS SO ORDERED.

DATED: Oct. 24, 2017

MT S Lasnik

The Honorable Robert S. Lasnik
United States District Court
Western District of Washington

JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
DISCOVERY PLAN - 3

Case No. 2:17-cv-01341-RSL



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